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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

PACHULSKI STANG ZIEHL & JONES LLP

Laura Davis Jones

Colin R. Robinson

Peter J. Keane

919 N. Market Street, 17th Floor

Wilmington, DE 19801

Telephone: (302) 652-4100 Facsimile: (302) 652-4400

Email: ljones@pszjlaw.com crobinson@pszjlaw.com

pkeane@pszjlaw.com

Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor. 1

Chapter 11

Case No. 23-12825 (MBK)

Re: Docket No. 890

JOINDER OF ARNOLD & ITKIN LLP TO OBJECTION TO PROFFERED EXPERT TESTIMONY OF CHARLES MULLIN, PH.D

Arnold & Itkin LLP ("<u>Arnold & Itkin</u>"), on behalf of certain talc personal injury claimants represented by Arnold & Itkin, hereby joins the *Objection to Proffered Expert Testimony of Charles Mullin, PH.D* (the "<u>Objection</u>")² filed by Paul Crouch, Individually and as Executor and as Executor Ad Prosequendum of the Estate of Cynthia Lorraine Crouch.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² Capitalized terms not otherwise defined herein shall have their meaning as set forth in the Objection.

Joinder

- 1. For the reasons set forth in the Objection, Arnold & Itkin respectfully requests that the Court sustain the Objection to the admission of Mr. Mullin's report and any proffer of Mr. Mullin's testimony by the Debtor.
- 2. Arnold & Itkin reserves all rights to make any further arguments in support of this Joinder and the Objection at the hearing scheduled on this matter.

WHEREFORE, for the reasons set forth in the Objection, Arnold & Itkin respectfully requests that the Court: (i) sustain the Objection; and (ii) grant such other and further relief as the Court deems appropriate.

Dated: June 27, 2023 PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Laura Davis Jones Colin R. Robinson Peter J. Keane 919 N. Market Street, 17th Floor Wilmington, DE 19801

Telephone: (302) 652-4100 Facsimile: (302) 652-4400 Email: ljones@pszjlaw.com

> crobinson@pszjlaw.com pkeane@pszjlaw.com

Counsel to Arnold & Itkin LLP